

EXHIBIT 4

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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 SUNIL SUDUNAGUNTA,
13 Individually and on behalf of all others
similarly situated,
14 Plaintiff,
15 v.
16 NANTKWEST, INC., PATRICK
17 SOON-SHIONG, RICHARD
18 GOMBERG, BARRY J. SIMON,
STEVE GORLIN, MICHAEL D.
BLASZYK, HENRY JI, RICHARD
KUSSEROW, JOHN T. POTTS, JR.,
ROBERT ROSEN, JOHN C.
THOMAS JR., MERRILL LYNCH,
PIERCE, FENNER & SMITH, INC.,
CITIGROUP GLOBAL MARKETS
INC., JEFFERIES LLC, PIPER
JAFFRAY & CO., and MLV & CO.,
LLC.,
Defendants.

Case No. 16-cv-01947-MWF-JEM

Consolidated with
2:16-cv-3438-MWF-JEM

CLASS ACTION

**DECLARATION OF KARA M.
WOLKE IN SUPPORT OF
APPLICATION FOR AN AWARD
OF ATTORNEYS' FEES FILED
ON BEHALF OF GLANCY
PRONGAY & MURRAY LLP**

Date: April 29, 2019
Time: 10:00 a.m.
Before: Hon. Michael Fitzgerald
Courtroom: 5A

I, KARA M. WOLKE, declare as follows:

1. I am a partner at Glancy Prongay & Murray LLP (“GPM”), Court-appointed Liaison Counsel (*see* ECF No. 34) in the above-captioned action (the “Action”). I submit this declaration in support of Plaintiffs’ application for an award of attorneys’ fees. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. GPM, as Liaison Counsel, was involved in all aspects of the Action and its settlement including, among other things: conducting factual investigation in preparation of filing the Complaint and each of the four Amended Complaints; initiating filings with the Court; drafting and reviewing pleadings, including each round of Defendants' motions to dismiss and Plaintiffs' motion for class certification; attending hearings; engaging in multiple meet-and-confer processes with opposing counsel and third party subpoena recipients during discovery; reviewing voluminous documents produced by Defendants and third parties; conferring with experts on the topics of liability and damages, and participating in Settlement negotiations.

3. As detailed in the within “Lodestar Chart,” GPM’s total lodestar is \$871,995.50:

Lodestar Chart

TIMEKEEPER/CASE	STATUS	HOURS	RATE	LODESTAR
ATTORNEYS:				
Robert Prongay	Partner	10.50	\$750.00	\$7,875.00
Kara Wolke	Partner	274.80	\$775.00	\$212,970.00
Lesley Portnoy	Partner	26.00	\$650.00	\$16,900.00

1	Casey Sadler	Partner	5.00	\$650.00	\$3,250.00
2	Charles Linehan	Associate	19.10	\$425.00	\$8,117.50
3	Alexa Mullarky	Associate	239.80	\$395.00	\$94,721.00
4	Melissa Wright	Associate	42.20	\$525.00	\$22,155.00
5	Vahe Mesropyan	Associate	39.80	\$425.00	\$16,915.00
6	Mark Berns	Staff Attorney	22.80	\$395.00	\$9,006.00
7	Pedro R. Ariston	Staff Attorney	1,138.40	\$395.00	\$449,668.00
8	TOTAL ATTORNEY	TOTAL	1,773.40		\$841,577.50
9	PARALEGALS:				
10	Harry Kharadjian	Senior Paralegal	47.75	\$290.00	\$13,847.50
11	Samantha Skouras	Paralegal	14.00	\$200.00	\$2,800.00
12	Emily Oswald	Paralegal	11.00	\$225.00	\$2,475.00
13	Jack Ligman	Research Analyst	21.75	\$310.00	\$6,742.50
14	Michaela Ligman	Research Analyst	15.70	\$290.00	\$4,553.00
15	TOTAL PARALEGAL	TOTAL	113.40		\$30, 418.00
16	TOTAL LODESTAR	TOTAL	1,886.80		\$871,995.50

4. The Lodestar Chart sets forth the amount of time GPM attorneys and professional staff billed from inception of the Action through and including April 1, 2019. The lodestar calculation for those individuals is based on GPM's current billing rates.

5. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by GPM. Time expended on GPM's application for fees and reimbursement of expenses has *not* been included in this request. In addition, attorneys and professional staff with fewer than five (5) hours of time dedicated to the matter are not included in the lodestar report.

6. The hourly rates for GPM's attorneys and professional support staff are substantially the same as rates that have been accepted by courts in other securities or shareholder litigation.

7. GPM's lodestar figures are based on its billing rates, which do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in GPM's billing rates.

I declare, under penalty of perjury, that the foregoing is true and correct.
Executed this 8th day of April, in Los Angeles, California.

Kara M. Wolke

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